SUSTAINABLE FINANCE DISCLOSURE REGULATION

The following statements are being published by NB Alternatives Advisers LLC ("**NBAA**") in its capacity as a financial market participant in respect of any financial products within the scope of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”):

I. Integration of Sustainability Risks

NBAA integrates certain financially material ESG factors (including the consideration of Sustainability Risks, as defined below) into the investment decision-making process for financial products under its management. The specific approach to the assessment of Sustainability Risks taken by NBAA, in its role as portfolio manager of any given financial product will depend on multiple factors, including (i) the objectives of the financial product’s strategy, (ii) the assets held by the financial product, (iii) the relevant investment time horizon, and (v) the overall investment process.

NBAA, as part of its investment decision-making process, undertakes analysis of financially material ESG factors in order to mitigate risk (including Sustainability Risk) and analyse and measure potential investment opportunities and how each of those influence portfolio construction.

“Sustainability Risks” are defined as environmental, social and governance events or conditions whose occurrence could have an actual or potential material negative impact on the value of an investment (and hence on the net asset value of the fund and on its returns). NBAA considers Sustainability Risks as a broad term which seeks to identify financially material risk that relates to ESG issues. Therefore, NBAA believes that the potential risks posed by Sustainability Risks can be limited through the responsible and proper management of the portfolios of the financial products it manages.

II. Consideration of Principal Adverse Impacts

NBAA does not currently consider the principal adverse impact indicators (“**PAIs**”) of its investment decisions on Sustainability Factors at entity level in the manner prescribed under the SFDR.

NBAA has fewer than 500 employees, allowing it to ‘comply or explain’ under the SFDR Article 4(1) requirement to publish a principal adverse sustainability impact (“**PASI**”) entity level statement. NBAA has opted against publishing a PASI entity level statement because it believes that the limited and inconsistent reporting of PAIs combined with the volatility associated with PAI data (due to portfolio and market movements) would not provide reliable data that investors could consistently assimilate, use and compare from one reference period to another.

NBAA adopts a decentralized investment management model, with each investment team being ultimately responsible for integrating sustainability considerations in their investment decision-making in a manner that is tailored to their investment styles and the financial products they manage, subject to the NBAA’s oversight and overall control framework. To date, the investment teams have determined that the PAIs are not relevant to the investment strategy of its financial product or that the investment objective of each financial product is better served by focusing on financial performance and financially material sustainability risks (without considering the PAIs).

Additionally, NBAA believes that the tailored approaches adopted by investment teams on sustainability matters for specific investment strategies and/or financial products means that an entity level statement on PAI consideration would not appropriately represent its approach.